

FILED

SEP -7 2023

CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	<u>S U P E R S E D I N G</u>
	)	<u>I N D I C T M E N T</u>
Plaintiff,	)	
	)	JUDGE DONALD C. NUGENT
v.	)	
	)	CASE NO. 4:23CR363
STANLEY E. REDD, JR.,	)	Title 7, United States Code,
	)	Sections 2156(a)(1) and (b);
Defendant.	)	Title 18, United States Code,
	)	Sections 922(g)(1), 924(a)(2), and
	)	924(c)(1)(A)(i);
	)	Title 21, United States Code,
	)	Sections 841(a)(1), (b)(1)(B)(vi),
	)	(b)(1)(C), 856(a)(1) and (b)

COUNT 1

(Felon in Possession of Firearms and Ammunition, 18 U.S.C. §§ 922(g)(1) and 924(a)(2))

The Grand Jury charges:

1. On or about May 18, 2021, in the Northern District of Ohio, Eastern Division, Defendant STANLEY E. REDD, JR., knowing he had previously been convicted of crimes punishable by imprisonment for terms exceeding one year, those being: Possession of Cocaine, on or about December 12, 2003, in case number 2002 CR 497, in the Trumbull County, Ohio, Court of Common Pleas; Possession of Cocaine, on or about November 26, 2003, in case number 2003 CR 196, in the Trumbull County, Ohio, Court of Common Pleas; Possession of Cocaine, on or about May 30, 2007, in case number 2006 CR 701, in the Trumbull County, Ohio, Court of Common Pleas; Trafficking in Cocaine and Possession of Cocaine on or about October 9, 2008, in case number 2008 CR 92, in the Trumbull County, Ohio, Court of Common Pleas; Possession of Cocaine, on or about April 24, 2013, in case number 2011 CR 163, in the Trumbull County,

Ohio, Court of Common Pleas; and Possession of Cocaine, on or about June 26, 2014, in case number 2013 CR 870, in the Trumbull County, Ohio, Court of Common Pleas, knowingly possessed in and affecting interstate commerce firearms, to wit: an Amadeo Rossi .38 caliber revolver, bearing serial number D304299, and a RG Industries, Model RG40, .38 caliber revolver, bearing serial number 039001, and ammunition, said firearms and ammunition having been shipped and transported in interstate and foreign commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT 2

(Possession with Intent to Distribute Fentanyl, 21 U.S.C. § 841(a)(1) and (b)(1)(B)(vi))

The Grand Jury further charges:

2. On or about May 18, 2021, in the Northern District of Ohio, Eastern Division, Defendant STANLEY E. REDD, JR. did knowingly and intentionally possess with the intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(B)(vi).

3. Before committing the offense charged in this count, Defendant STANLEY E. REDD, JR. had a final conviction for a serious drug felony, specifically, a conviction for Trafficking in Cocaine in violation of Ohio Revised Code Sections 2925.03(A)(1)(C)(4)(f) and 2925.42(A)(1)(b), on or about October 9, 2008, in case number 2008 CR 92, in the Trumbull County, Ohio, Court of Common Pleas, for which he served more than 12 months of imprisonment and for which he was released from serving any term of imprisonment related to that offense within 15 years of the commencement of the instant offense.

COUNT 3

(Possession with Intent to Distribute Cocaine, 21 U.S.C. § 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

4. On or about May 18, 2021, in the Northern District of Ohio, Eastern Division, Defendant STANLEY E. REDD, JR. did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and (b)(1)(C).

COUNT 4

(Using and Maintaining a Drug Premises, 21 U.S.C. § 856(a)(1) and (b))

The Grand Jury further charges:

5. From on or about May 5, 2021, through on or about May 18, 2021, in the Northern District of Ohio, Eastern Division, Defendant STANLEY E. REDD, JR. did knowingly use and maintain a place located at XX7 Austin Avenue, SW, Warren, Ohio for the purpose of distributing controlled substances, in violation of Title 21, United States Code, Section 856(a)(1) and (b).

COUNT 5

(Possessing a Firearm in Furtherance of a Drug Trafficking Crime,  
18 U.S.C. § 924(c)(1)(A)(i))

The Grand Jury further charges:

6. On or about May 18, 2021, in the Northern District of Ohio, Eastern Division, Defendant STANLEY E. REDD, JR. did knowingly possess a firearm, to wit: an Amadeo Rossi .38 caliber revolver, bearing serial number D304299 in furtherance of drug trafficking crimes for which he may be prosecuted in a court of the United States, those being: Possession with Intent to Distribute a Fentanyl, as charged in Count 2 of this indictment, Possession with Intent to

Distribute Cocaine, as charged in Count 3 of this indictment, and Using and Maintaining a Drug Premises, as charged in Count 4 of this indictment, in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

COUNT 6

(Sponsoring or Exhibiting Animals in Animal Fighting Venture, 7 U.S.C. § 2156(a)(1))

The Grand Jury further charges:

7. In or around December 2020 to on or about May 18, 2021, in the Northern District of Ohio, Eastern Division, Defendant STANLEY E. REDD, JR. did knowingly sponsor or exhibit an animal, to wit: a black pit bull-type dog identified as SR Dog #10, in an animal fighting venture, as defined in Title 7, United States Code, Section 2156(f)(1), in violation of Title 7, United States Code, Section 2156(a)(1).

COUNT 7

(Sponsoring or Exhibiting Animals in Animal Fighting Venture, 7 U.S.C. § 2156(a)(1))

The Grand Jury further charges:

8. In or around December 2020 to on or about May 18, 2021, in the Northern District of Ohio, Eastern Division, Defendant STANLEY E. REDD, JR. did knowingly sponsor or exhibit an animal, to wit: a tan pit bull-type dog identified as “Niko”, in an animal fighting venture, as defined in Title 7, United States Code, Section 2156(f)(1), in violation of Title 7, United States Code, Section 2156(a)(1).

COUNT 8

(Buying, Selling, Delivering, Possessing, Training, or Transporting Animals for Participation in Animal Fighting Venture, 7 U.S.C. § 2156(b))

The Grand Jury further charges:

9. In or around December 2020 to on or about May 18, 2021, in the Northern District of Ohio, Eastern Division, Defendant STANLEY E. REDD, JR. did knowingly sell, buy,

possess, train, transport, deliver, or receive any animal, to wit: a brown and white pit bull-type dog identified as SR Dog #1, for purposes of having the animal participate in an animal fighting venture, as defined in Title 7, United States Code, Section 2156(f)(1), in violation of Title 7, United States Code, Section 2156(b).

COUNT 9

(Buying, Selling, Delivering, Possessing, Training, or Transporting Animals for Participation in Animal Fighting Venture, 7 U.S.C. § 2156(b))

The Grand Jury further charges:

10. In or around December 2020 to on or about May 18, 2021, in the Northern District of Ohio, Eastern Division, Defendant STANLEY E. REDD, JR. did knowingly sell, buy, possess, train, transport, deliver, or receive any animal, to wit: a tan and black pit bull-type dog identified as SR Dog #4, for purposes of having the animal participate in an animal fighting venture, as defined in Title 7, United States Code, Section 2156(f)(1), in violation of Title 7, United States Code, Section 2156(b).

COUNT 10

(Buying, Selling, Delivering, Possessing, Training, or Transporting Animals for Participation in Animal Fighting Venture, 7 U.S.C. § 2156(b))

The Grand Jury further charges:

11. In or around December 2020 to on or about May 18, 2021, in the Northern District of Ohio, Eastern Division, Defendant STANLEY E. REDD, JR. did knowingly sell, buy, possess, train, transport, deliver, or receive any animal, to wit: a tan and white pit bull-type dog identified as SR Dog #5, for purposes of having the animal participate in an animal fighting venture, as defined in Title 7, United States Code, Section 2156(f)(1), in violation of Title 7, United States Code, Section 2156(b).

COUNT 11

(Buying, Selling, Delivering, Possessing, Training, or Transporting Animals for Participation in Animal Fighting Venture, 7 U.S.C. § 2156(b))

The Grand Jury further charges:

12. In or around December 2020 to on or about May 18, 2021, in the Northern District of Ohio, Eastern Division, Defendant STANLEY E. REDD, JR. did knowingly sell, buy, possess, train, transport, deliver, or receive any animal, to wit: a tan and white pit bull-type dog identified as SR Dog #8, for purposes of having the animal participate in an animal fighting venture, as defined in Title 7, United States Code, Section 2156(f)(1), in violation of Title 7, United States Code, Section 2156(b).

COUNT 12

(Buying, Selling, Delivering, Possessing, Training, or Transporting Animals for Participation in Animal Fighting Venture, 7 U.S.C. § 2156(b))

The Grand Jury further charges:

13. In or around December 2020 to on or about May 18, 2021, in the Northern District of Ohio, Eastern Division, Defendant STANLEY E. REDD, JR. did knowingly sell, buy, possess, train, transport, deliver, or receive any animal, to wit: a black and white pit bull-type dog identified as SR Dog #9, for purposes of having the animal participate in an animal fighting venture, as defined in Title 7, United States Code, Section 2156(f)(1), in violation of Title 7, United States Code, Section 2156(b).

COUNT 13

(Buying, Selling, Delivering, Possessing, Training, or Transporting Animals for Participation in Animal Fighting Venture, 7 U.S.C. § 2156(b))

The Grand Jury further charges:

14. In or around December 2020 to on or about May 18, 2021, in the Northern District of Ohio, Eastern Division, Defendant STANLEY E. REDD, JR. did knowingly sell, buy,

possess, train, transport, deliver, or receive any animal, to wit: a black pit bull-type dog identified as SR Dog #10, for purposes of having the animal participate in an animal fighting venture, as defined in Title 7, United States Code, Section 2156(f)(1), in violation of Title 7, United States Code, Section 2156(b).

COUNT 14

(Buying, Selling, Delivering, Possessing, Training, or Transporting Animals for Participation in Animal Fighting Venture, 7 U.S.C. § 2156(b))

The Grand Jury further charges:

15. In or around December 2020 to on or about May 18, 2021, in the Northern District of Ohio, Eastern Division, Defendant STANLEY E. REDD, JR. did knowingly sell, buy, possess, train, transport, deliver, or receive any animal, to wit: a red pit bull-type dog identified as SR Dog #11, for purposes of having the animal participate in an animal fighting venture, as defined in Title 7, United States Code, Section 2156(f)(1), in violation of Title 7, United States Code, Section 2156(b).

COUNT 15

(Buying, Selling, Delivering, Possessing, Training, or Transporting Animals for Participation in Animal Fighting Venture, 7 U.S.C. § 2156(b))

The Grand Jury further charges:

16. In or around December 2020 to on or about May 18, 2021, in the Northern District of Ohio, Eastern Division, Defendant STANLEY E. REDD, JR. did knowingly sell, buy, possess, train, transport, deliver, or receive any animal, to wit: a tan pit bull-type dog identified as SR Dog #12, for purposes of having the animal participate in an animal fighting venture, as defined in Title 7, United States Code, Section 2156(f)(1), in violation of Title 7, United States Code, Section 2156(b).

FORFEITURE

The Grand Jury further charges:

17. For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853; Title 18, United States Code, Section 924(d)(1); Title 7, United States Code, Section 2156(e); and Title 28, United States Code Section 2461(c), the allegations of Counts 1 through 15 are incorporated herein by reference. As a result of the foregoing offenses, Defendant STANLEY E. REDD, JR. shall forfeit to the United States any and all property constituting or derived from any proceeds he obtained directly or indirectly as a result of the violations charged in Counts 2, 3, and 4; any and all of his property used or intended to be used in any manner or part to commit or to facilitate the commission of the violations charged in Counts 2, 3, and 4; any and all firearms and ammunition involved in or used in the commission of the violations charged in Counts 1 and 5; any and all animals involved in the violations charged in Counts 6 through 15; including, but not limited to, the following:

- a. an Amadeo Rossi .38 caliber revolver, bearing serial number D304299, and any ammunition;
- b. a RG Industries, Model RG40, .38 caliber revolver, bearing serial number 039001, and any ammunition; and
- c. \$61,996.00 in U.S. currency seized on May 18, 2021, from STANLEY E. REDD, JR.

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.